

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Fatira D. Elhadi

CHAPTER 13

CASE NO. 17-10375-jkf

Fatira D. Elhadi

Movant

vs.

PNC Bank, National Association

Respondent

**REPLY OF PNC BANK, NATIONAL ASSOCIATION TO  
DEBTORS' MOTION TO REINSTATE THE AUTOMATIC STAY WITH REGARD TO  
PNC BANK, NATIONAL ASSOCIATION**

PNC Bank, National Association ("PNC Bank, N.A."), by its Attorneys, Udren Law Offices, P.C., hereby Answers the Debtors' Motion to Reinstate the Automatic Stay with regard to PNC Bank, National Association as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. PNC Bank, N.A. is without sufficient information to admit or deny Debtor's motivations in failing to respond to the Motion for Relief and therefore denies this averment.
6. Admitted.
7. Denied. PNC Bank, N.A. filed a Motion for Relief from Automatic Stay on August 15, 2017, which Motion averred that Debtor was due for the June 1, 2017 post petition payment and all payments thereafter. After the time for Debtor to Answer had expired, PNC Bank, N.A.

filed a Certification of No Answer on August 31, 2017. An Order granting the Motion for Relief of PNC Bank, N.A. was entered on September 13, 2017. PNC Bank, N.A. has relied on the Relief Order and since it was entered has caused a Writ of Execution to issue in state Court pursuant to the Relief Order and has incurred Sheriff's costs. PNC Bank, N.A. would be highly prejudiced if Debtor were permitted to reverse the Relief Order at this late juncture.

8. Denied. PNC Bank, N.A. is without sufficient information to admit or deny the allegations contained in this paragraph and the same are therefore denied.

9. Denied. PNC Bank, N.A. is without sufficient information to admit or deny the allegations contained in this paragraph and the same are therefore denied.

10. Denied. PNC Bank, N.A. is without sufficient information to admit or deny the allegations contained in this paragraph and the same is therefore denied.

**WHEREFORE**, Respondent, PNC Bank, National Association, respectfully requests that this Court enter an Order denying the Debtors' Motion to Reinstate the Automatic Stay with respect to the premises at 608 Ruskin Lane, Yeadon, PA 19050.

/s/ Nicole LaBletta  
Nicole LaBletta, Esquire  
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